# ATTACHMENT TO SUBPOENA ISSUED to Baylor University

## PRODUCE THE FOLLOWING:

Administrative, Financial, and Medical Records in your immediate possession, custody or control relating to:

• Robert Theron Brockman: (DOB 5/28/1941)

Time Period: Inception to Present

Records produced shall include the following items:

All described records related to Mr. Brockman maintained by you, your surrogates, agents, or assigns covering the time period indicted. Please note the attached Court Order, pursuant to the Federal Rules of Criminal Procedure 17(c) and Title 45 CFR § 164.512(e)(1)(i) command production of these records within 30 days of the service of this Subpoena. Also please note that any medical records produced pursuant to this subpoena should be forwarded directly to Special Agent Ryan Rickey at the address below.

### INSTRUCTIONS FOR PRODUCTION OF ELECTRONICALLY STORED RECORDS

#### I. General

- A. Electronically stored records shall be produced in electronic form and shall include text data and image data held:
  - 1. In your record retention systems; and/or
  - 2. By your technology, data, or other service provider(s).

# II. Text Data

- A. Text data relating to transactions shall be produced within a data file:
  - 1. Using a delimited ASCII text data format; or
  - 2. Using software that can export to a commonly readable, non-proprietary file format without loss of data.
- B. Text data files relating to transactions shall include field descriptions (e.g., account number, date/time, description, payee/payor, check number, item identifier, amount, etc.)

#### III. Image Data

- A. Image data shall be produced in graphic data files in a commonly readable, non-proprietary format with the highest image quality maintained.
- B. Image data of items associated with transactions (e.g., cancelled checks, deposit slips, etc.) shall be:
  - 1. Produced in individual graphic data files with any associated endorsements; and
  - 2. Linked to corresponding text data by a unique identifier.

## IV. Encryption/Authentication

- A. Electronically stored records may be transmitted in an encrypted container. Decryption keys and/or passwords shall be produced separately at the time the data is produced.
- B. Authentication, such as hash coding, may be set by agreement.

C. Affidavits or certificates of authenticity for the records may be included as part of the electronic production.

### V. Reimbursement

A. The cost of producing financial records of certain customers may be reimbursable. See the Right to Financial Privacy Act, 12 U.S.C., Section 3415 and 12 C.F.R., Part 219 (Regulation S) (revised effective 1/1/2010).

Please send the records to: Ryan Rickey, IRS CI Special Agent 1999 Broadway, 24<sup>th</sup> Floor, Denver, CO 80202.

Please contact Special Agent Ryan Rickey at 702-289-6587 with any questions.